

1 CHRISTOPHER M. PETERSON, ESQ.

2 Nevada Bar No.: 13932

3 SOPHIA A. ROMERO, ESQ

4 Nevada Bar No.: 12446

5 **AMERICAN CIVIL LIBERTIES
UNION OF NEVADA**

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12 *Attorneys for Plaintiffs*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 KELVIN GORDON, an individual; LILITH
16 MCGRATH, an individual; KIANA FULLMORE,
17 an individual; and the AMERICAN CIVIL
LIBERTIES UNION OF NEVADA
18 FOUNDATION, a domestic nonprofit corporation,

19 Plaintiffs,

20 vs.

21 THE CITY OF LAS VEGAS, a local municipal
22 government entity; and FREMONT STREET
23 EXPERIENCE, LLC, a domestic limited liability
24 company;

25 Defendants.

26 Case No.: 2:22-cv-01446-RFB-EJY

27 NOTICE OF WITNESSES AND
DOCUMENTS FOR HEARING
SCHEDULED ON OCTOBER 7,
2022

Pursuant to the Court's order dated October 4, 2022, [ECF No. 27] Plaintiffs provide notice of the documents Plaintiffs may offer in support of Plaintiffs' Motion for Temporary Restraining Order at the hearing currently scheduled for October 7, 2022. In addition to the documentation previously filed into the record by Plaintiffs and Defendant Fremont Street Experience, LLC,¹ Plaintiffs Kelvin Gordon, Lilith McGrath, Kiana Fullmore, and the American Civil Liberties Union of Nevada Foundation, through their attorney of record, intend to produce the following:

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1 **I. Documents**

- 2 1. Photograph of Plaintiff McGrath's driver's license (redacted), attached as
3 Plaintiff's **EXHIBIT 9**.
- 4 2. Photograph of Plaintiff Fullmore's driver's license (redacted), attached as
5 Plaintiff's **EXHIBIT 10**.
- 6 3. Video, manually filed with Court, hereafter Plaintiff's **EXHIBIT 11**.

7

8 DATED this 5 day of October, 2022

9

10 Pursuant to NRS 53.045, I declare under
11 penalty of perjury that the foregoing is true
12 and correct.

13 */s/ Christopher Peterson*
14 CHRISTOPHER M. PETERSON, ESQ.
15 Nevada Bar No.: 13932
16 SOPHIA A. ROMERO, ESQ.
17 Nevada Bar No.: 12446
18 **AMERICAN CIVIL LIBERTIES**
19 **UNION OF NEVADA**
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21 Las Vegas, NV 89106
22 Telephone: (702) 366-1226
23 Facsimile: (702) 366-1331
24 Email: peterson@aclunv.org
25 Email: romero@aclunv.org
26 *Attorneys for Plaintiffs*

LR 5-1 PROOF OF SERVICE

I HEREBY CERTIFY that on the 5 day of October ,20 22

I served: PLAINTIFF'S NOTICE OF WITNESSES AND DOCUMENTS FOR HEARING SCHEDULED FOR OCTOBER 7, 2022

X EM/ECF;

Electronic mail; or

US Mail or Carrier Service

Upon: BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614

The City of Las Vegas
Las Vegas City Attorney
495 S. Main St.
Las Vegas, Nevada 89101

/s/ Courtney Jones
COURTNEY JONES,
an employee of the ACLU of Nevada